

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

)

Fitchburg Gas & Electric Light Company) D.T.E. 99-110 (Phase II)

)

ATTORNEY GENERAL'S FIRST SET OF

DOCUMENT AND INFORMATION REQUESTS

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to the Company or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

Untitled

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.

7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.

8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.

9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.

10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.

11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.

12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.

14. Each request for information includes a request for all documentation which

supports the response provided.

15. Provide three copies of each response.

16. The term "Company" refers to Fitchburg Gas and Electric Light Company, UNITIL and/or any affiliate. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.

17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

The following are the Attorney General's First Set of information requests in the above referenced docket.

AG1-1 Referring to the Reconciliation of Transition Costs and Revenues for 2000, please provide support for the following items:

Purchased Power contract costs
Transaction Costs and Administrative Expenses
Economic buyout payments
Costs of J/O Units, with an explanation of why these are included

AG1-2 Please reconcile the Purchased Power contract costs in the year 2000 Variable Transition Costs to the Select Retained Entitlement Obligation for the year 2000.

AG1-3 Please explain why the Linweave Transmission expenses are included in year 2000 Variable Transition Costs.

AG1-4 Please explain why interest is calculated on the gross cumulative over or under recovered accrued revenue rather than on the accrued revenue balance net of income taxes.

AG1-5 Please provide calculations supporting the Amortization of Fixed Costs and the Carrying Charges on Fixed Costs for July 1999.

AG1-6 Referring to the Reconciliation of Transition Costs and Revenues for 1999, please provide support for the following items:

Purchased Power contract costs
Transaction Costs and Administrative Expenses
Hydro-Quebec Transmission
Costs of J/O Units, with an explanation of why these are included
Sales for Resale and deliveries from NEPOOL

Untitled

AG1-7 Referring to the Reconciliation of Transition Costs and Revenues for 1999, please reconcile the Purchased Power contract costs for the months September - December 1999 in the Variable Transition Costs to the Select Retained Entitlement Obligation for those months.

AG1-8 Referring to the Reconciliation of Transition Costs and Revenues for 1999, please reconcile the reclassifications from Standard Offer costs in July to the Standard Offer Reconciliation for that month.

AG1-9 Referring to the Reconciliation of Transition Costs and Revenues for 1999, please explain the decrease in TC revenue from August to September.

AG1-10 Referring to the Reconciliation of Transition Costs and Revenues for 1999, please provide support for the Fuel Charge credit reversals referenced in Notes 14, 16, and 17.

AG1-11 Referring to the Reconciliation of Standard Offer Service Costs and Revenues please explain the SOS deferred debits, and provide support for the monthly amounts in 1999 and 2000.

AG1-12 Referring to the Reconciliation of Standard Offer Service Costs and Revenues please explain the LERS/Logica amortization and expenses and administrative costs, and provide support for the monthly amounts in 1999 and 2000.

AG1-13 Referring to the Reconciliation of Standard Offer Service Costs and Revenues please explain why the SOS revenues are unequal to the Constellation costs for the months May through October of 1999.

AG1-14 Referring to the Reconciliation of Variable Default Service Costs and Revenues, please provide supporting calculations for the \$117,738 adjustment referenced in Footnote 2.

AG1-15 Referring to the Calculation of the Residual Value Credit, with regard to the New Haven Harbor, Wyman 4, #7 Turbine, and Millstone 3 divestitures, please provide supporting documentation for the following:

True-up for Actual plant balances
Capital investments after 12/31/95
Book Value of other items in sale
Adjustment to tax basis for true up for Actual plant balances and Capital investments after 12/31/95

AG1-16 Referring to the Calculation of the Residual Value Credit, with regard to the Millstone 3 divestiture, please explain the adjustment to the tax basis of (\$2,697,000).

Untitled

AG1-17 Referring to the Calculation of the Residual Value Credit, please explain why the remaining tax basis of the plant being divested is not taken into account in calculating the tax effect of the sale.

AG1-18 Please provide supporting documentation for the \$208,000 of transaction costs associated with the divestiture of generating assets.

AG1-19 Please provide supporting documentation for the \$815,000 Revised Regulatory Asset Book Basis.

Dated: March 2, 2000